

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SUSAN LANG,
Plaintiff,

v.

LANDMARK SCHOOL, INC.,
Defendant.

C.A. NO. 04-11867-NG

**JOINT MOTION TO CONTINUE STATUS
CONFERENCE AND LENGTHEN DISCOVERY**

The parties jointly move this Court to a) continue the status conference now scheduled for June 16, 2005, until sometime convenient for the Court after September 5, 2005; and to b) allow the parties to continue with discovery up to the new date for the status conference. The parties so move for the following reasons:

1. This action stems from Plaintiff's former employment relationship with the Defendant. Plaintiff claims that the Defendant discriminated against her due to her disability.
2. The parties have done paper discovery and have taken some depositions and, at this point, deem it wise to explore mediation as a means to resolution.
3. Mediation is scheduled for July 13, 2005, with Marilyn H. Zuckerman.
4. Discovery has proven difficult to complete because Plaintiff has had to go through numerous chemotherapy treatments. Discovery has proven difficult to complete also because the relevant fact pattern spans nearly 10 years and involves numerous documents and witnesses.
5. The parties wish to continue with discovery in the event mediation fails on July 13, 2005. The parties wish to continue with discovery until the new date of the status conference.
6. No party will be prejudiced if the Court allows this Motion.

WHEREFORE, the parties jointly request that this Motion be allowed and that a) the status conference be continued until sometime convenient for the Court after September 5, 2005; and b) the parties be able to continue discovery up to the new date for the status conference.

The Plaintiff,
SUSAN LANG,
By her attorney,
Law Office of Mitchell J. Notis

The Defendant,
LANDMARK SCHOOL, INC.,
By its attorneys,
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Dated: June 10, 2005

I hereby certify that a true copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by mail
(by hand) on 6-10-05

